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#04-AAER-1  
November 29, 2004

California Energy Commission  
1516 Ninth Street, Mail Station 4  
Sacramento, CA 95814-5512

On behalf of the Association of Home Appliance Manufacturers (AHAM), I am submitting our comments to the fifteen-day language of the California Energy Commission's appliance energy efficiency standards rulemaking on external power supplies. AHAM's involvement on this issue has included testimony at the hearing on the forty-five day language as well as participation in an earlier hearing. We have also provided written comments on this matter.

AHAM urges the CEC not to apply the proposed test procedure and efficiency standards for External Power Supplies to battery chargers used with small appliances. The current version of the test procedure, included in the fifteen-day language, does not properly characterize the energy used by battery chargers in these products and, as a result, would not result in meaningful energy savings when used to develop an efficiency standard but would instead cause economic harm to U.S. manufacturers. This test procedure, used in conjunction with an efficiency standard, would require manufacturers to use battery chargers that, in some cases, could result in the doubling of the manufacturing costs for the appliance itself with little, if any, energy savings benefits. Such a cost increase for products in the thirty-dollar range would reduce options for low income consumers. As part of our filing on the forty-five day language, AHAM submitted a study of the payback of the proposed regulations for appliance battery chargers. This study shows that the proposed regulation has a "negative payback" for the citizens of California. We ask the CEC to temporarily withhold regulation of these products until a more appropriate test procedure can be developed.

AHAM will be working with the U.S. Environmental Protection Agency in 2005 to develop a test procedure for battery chargers for use in the Energy Star Program on External Power Supplies. EPA has provided a twelve-month window for the development of this test procedure. If a procedure cannot be developed within that time, Energy Star will require that the current External Power Supplies test procedure be applicable for battery chargers. We ask that the CEC similarly consider the development of a more appropriate test procedure for these products.

Once an appropriate test procedure is established, then the justification for and level of any standard can be properly evaluated. We understand that the CEC is open to reconsideration at that time.

We must note that we have heard no substantive comments from the Commission or its consultants calling into question our technical points on the draft test procedure. Without technical disagreement, and with the potential impacts on manufacturers and consumers so

significant, we urge the Commission to provide the time for development of a reasonable solution.

We appreciate correspondence from Commissioners Rosenfeld and Pfannenstiel indicating the willingness of the Commission to work with AHAM in the next year on this matter. We urge the Commission to embrace the goal of a uniform test procedure and energy use metric that is consistent with the Energy Star program.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne E. Morris". The signature is fluid and cursive, with a large initial "W" and "M".

Wayne E. Morris  
Vice President, Division Services